

Investment, LLC is Wal-Mart Stores East, LLC fka Wal-Mart Stores East, Inc.,¹ an Arkansas limited liability company. The sole member of Wal-Mart Stores East, LLC is Walmart Inc. fka Wal-Mart Stores, Inc., a Delaware corporation. The principal place of business for all entities mentioned is 702 S.W. 8th Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states.

The amount in controversy is in excess of the federal jurisdictional requisite of \$75,000. Plaintiff Kristi Dean “demands judgment against the Defendants in an amount not to exceed \$200,000.00.” Plaintiff Joseph T. Dean “demands judgment against the Defendants in an amount not to exceed \$25,000.00.”

Defendants Walmart, Inc., Wal-Mart Stores, Inc., and Wal-Mart Stores East, LP, were served with process on September 29, 2020. Fewer than thirty days have expired since service of process on Defendants. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b).

WHEREFORE, Defendants hereby give notice of the removal of this action pending in the Circuit Court of Wilson County, Tennessee, to the United States District Court for the Middle District of Tennessee, Nashville Division, and requests that the proceedings be held thereon.

/s/ Maria T. de Quesada

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¹Wal-Mart Stores East, Inc. was converted to an Arkansas limited liability company on January 25, 2011.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was electronically filed with the Court and was served by U.S. Mail, postage prepaid, upon:

Hugh Green, Esq.
LAW OFFICES OF HUGH GREEN
100 Public Square
Lebanon, TN 37087
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this the 28th day of October, 2020.

/s/ Maria T. de Quesada